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January 10, 2008

Via ECF

Magistrate Judge Lawrence M. McKenna
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Prieto v. Target, et al.
Our File No : DTS 23516
Docket No : 07 CV 6338
Date of Loss : 6/19/2004

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 1/16/08
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Dear Judge McKenna:

Please be advised the law firm of Connors & Connors, P.C. represents Target in the above captioned matter.

Pursuant to the initial discovery order, all discovery is to be completed by January 31, 2008. The depositions of all parties are currently scheduled for January 18, 2008. Our office has contacted Dr. Neil J. Cobelli and Dr. Stuart Remer to schedule their depositions. Dr. Stuart Remer is not available for deposition until February 6, 7 and 14th, 2008; Dr. Neil J. Cobelli's has informed our office that he does not appear for any depositions unless he is an expert on the case.

Therefore, both parties request that the completion of discovery be extended to February 29, 2008, to allow for the depositions of the above-named physicians. The undersigned is prepared however to proceed as the Court directs.

Thank you for the opportunity to have addressed you in this matter.

Respectfully submitted,


John P. Connors, Jr.
jpc@connorslaw.com

*Accepted. So
ordered:
Mr. N
1/16/08*

JPC,JR./tt/mr

cc: Babaja & Guarneri
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